REMARKS

Reconsideration of the present application is respectfully requested.

Claims 1-14 are pending in the application, of which Claims 1, 6 and 11 are written in independent form.

Under 35 U.S.C. §102(b), the Examiner rejected the Claims 1-2, 4-7, 9-12 and 14-15, as being anticipated by 3GPP TR 23.846 1.0.0 (hereinafter *TR 23.846*). The Examiner rejected Claims 3, 8 and 13 under 35 U.S.C. §103(a) as being unpatentable over *TR 23.846*.

Regarding the §102(b), the Examiner alleged that *TR 23.846* teaches each and every element that is recited in these rejected claims. In response, Applicants respectfully traverse.

Although *TR 23.846* appears to teach in section 6.11 the allocation of a TMGI when a UE joins an IP multicast group, the reference does not teach directly replying, by the SGSN, if an MBMS TMGI has been added into the SGSN records as set forth in step b) of Claim 1. In other words, it is respectfully asserted that *TR 23.846* does not explicitly or even impliedly teach this recitation in Claim 1 when the "if" condition is met, because the reference never determines whether the "if" condition at issue in Claim 1 is met.

In addition, *TR 23.846* does not teach step c) in Claim 1, in that the SGSN in the reference fails to send any message to a GGSN *if there is no record for the (MBMS) service in the SGSN*, as further recited *inter alia* in Claim 1. At best, in the first full paragraph on page 35, *TR 23.846* may teach that a T-SGSN notifies a GGSN of its wish to terminate reception of transmissions associated with the service, if the T-SGSN determines that no other RNCs have joined the multicast group. However, Applicants respectfully assert that this teaching clearly fails to read on at least the italicized portion of the foregoing recitation at issue.

Moreover, section 7.3.1 at step 5 cited by the Examiner clearly fails to teach if the GGSN has the TMGI corresponding to this (MBMS) service, the GGSN sending it to the SGSN, at least

because there is no mention of the TMGI in the cited section and paragraph. For that matter, TMGI does not appear to be discussed in any portion of the cited section 7.3.1. Clearly, *TR 23.846* is deficient in explicitly or even impliedly teaching step c) in Claim 1, contrary to the § 102(b) rejection.

Neither does section 7.4.1 teach the GGSN creating a TMGI for the MBMS service and transferring it to the SGSN if there is no record for this service in the GGSN, as recited in step d) in Claim 1, because TMGI is not even discussed in the cited section of *TR 23.846*. Section 7.4.1 appears to teach sending a Create MBMS PDP Context Response from the GGSN to the SGSN, but this teaching fails to read on the recitation at issue. The cited section 7.4.1 of the reference also fails to teach step e) in Claim 1, as once again there is no TMGI discussed in this section of the reference. For at least the foregoing reasons, it is respectfully submitted that the Examiner is incorrect.

To further explain the distinctions between the cited art and the rejected claims, Applicants respectfully set forth the following. Steps c) and d) of Claim 1 recite that if there is no record for the service requested by the UE in the SGSN, the GGSN creates a TMGI for the MBMS service and transfers it to the SGSN. However, Section 7.4.1, step 3~4 of TR23.846 cited by the Examiner merely discloses that the SGSN transmits the MBMS PDP Context Request to the GGSN and receives a response to the Request, but fails to teach the GGSN creating the TMGI for the MBMS service and transferring it to the SGSN if there is no record for the service requested by the UE in the SGSN, as in Claim 1.

As to the rejection of Claim 6, the Examiner cited TR23.846. In steps c) and d) in Claim 6, it is recited that if there is no record for the service requested by the UE in the SGSN, the SGSN creates the TMGI for the MBMS service and transfers it to the GGSN and the GGSN then maps and manages the TMGI with IP multicast address. However, Section 7.3.1 of TR23.846 cited by the Examiner discloses the use of Iu-flex, but neither suggests a problem caused when a plurality of SGSNs allocates the same TMGI to the same MBMS if using the Iu-flex nor mentions the allocation method. In addition, Section 7.4.1 of TR23.846 merely discloses transmission/reception of MBMS

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PDP Context Request/Response between the SGSN and the GGSN, but fails to teach the recitations at issue in Claim 6.

Section 7.3.1 and Section 7.4.1 of TR23.846 fail to teach Claim 11 at least where it is recited that the SGSN generates the TMGI and transfers the MBMS context request update including the TMGI and the IP multicast address to another SGSN.

To further assist in the understanding of the distinctions between the present claims and the cited art, it is respectfully asserted that FIGs. 3, 6, and 7 herein show signaling procedures for exchanging the MBMS Context Request/Response between the SGSN and the GGSN. However, the MBMS Context Request/Response message itself is a general message exchanged between the SGSN and the GGSN during MBMS service activation of the UE. The present claims solve a problem of allocating different TMGIs for the same MBMS service to the SGSNs as disclosed in descriptions of FIGs. 3, 6, and 7 and corresponding independent claims. However, the Examiner suggests that the recitations in the present claims are similar to TR23.846 by reason that Section 7.4.1 of TR23.846 discloses a procedure for transmitting/receiving the PDP Context Request/Response. This is another instance in which it is respectfully submitted that the Examiner's rejection is incorrect.
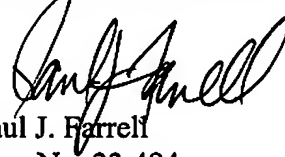
For at least the foregoing reasons, Applicants respectfully request withdrawal of the §102(b) rejection of Claims 1-2, 4-7, 9-12 and 14-15.

Regarding the §103(a) rejection of Claims 3, 8, and 13, it is respectfully submitted that this rejection is incorrect at least in view of the foregoing arguments against the §102(b) rejection of Claims 1-2, 4-7, 9-12 and 14-15. Accordingly, withdrawal of the §103(a) rejection is respectfully requested.

Independent Claims 1, 6 and 11 are believed to be in condition for allowance. Without conceding the patentability per se of dependent Claims 2-5, 7-10 and 12-14, these are likewise believed to be allowable by virtue of their dependence on their respective amended independent claims. Accordingly, reconsideration and withdrawal of the rejections of dependent Claims 2-5, 7-10 and 12-14 is respectfully requested.

Accordingly, all of the claims pending in the Application, namely, Claims 1-14, are believed to be in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicants' attorney at the number given below.

Respectfully submitted,

Paul J. Farrell
Reg. No. 33,494
Attorney for Applicant

THE FARRELL LAW FIRM
333 Earle Ovington Blvd. Suite 701
Uniondale, New York 11553
Tel: (516) 228-3565
Fax: (516) 228-8475

PJF/RCC/dr